

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

LEAGUE OF UNITED LATIN AMERICAN  
CITIZENS, *et al.*,

*Plaintiffs,*

v.

GREG ABBOTT, in his official capacity as  
Governor of the State of Texas, *et al.*,

*Defendants.*

CIVIL ACTION NO.  
3:21-cv-00259-DCG-JES-JVB  
[Consolidated Action: Lead Case]

**LULAC PLAINTIFFS' UNOPPOSED MOTION TO EXCEED PAGE LIMIT FOR  
THEIR REPLY IN SUPPORT OF THEIR MOTION TO REOPEN DISCOVERY FOR  
THE LIMITED PURPOSE OF SEEKING SPECIFIC DOCUMENTS FROM DAVE'S  
REDISTRICTING, LLC**

Pursuant to Local Rule CV-7(E)(3), LULAC Plaintiffs move for leave to file a reply brief in excess of one page above the page limit—for up to six pages total—in support of their Motion to Reopen Discovery for the Limited Purpose of Seeking Specific Documents from Dave's Redistricting, LLC. Dkt. 617. A proposed order is attached hereto, along with LULAC Plaintiffs' proposed reply.

LULAC Plaintiffs seek leave to exceed the page limit in order to address fully the arguments set forth in the State's opposition to LULAC Plaintiffs' motion. *See* Dkt. 622. Granting this motion will not prejudice any party. The State does not oppose the instant motion.

**CONCLUSION**

For the foregoing reasons, LULAC Plaintiffs respectfully request that the Court grant this motion.

DATED: October 31, 2022

s/ Nina Perales

Nina Perales  
Fátima Menendez  
Kenneth Parreno\*  
Julia Longoria  
Massachusetts Bar No. 705747  
MEXICAN AMERICAN LEGAL  
DEFENSE AND EDUCATIONAL FUND  
110 Broadway, Suite 300  
San Antonio, TX 78205  
(210) 224-5476

Nikolas Youngsmith\*  
1016 16th Street NW, Suite 100  
Washington, DC 20036  
(202) 293-2828  
Fax: (202) 293-2848

\*Admitted *pro hac vice*

*Counsel for LULAC Plaintiffs*

**CERTIFICATE OF CONFERENCE**

I hereby certify that, on October 28, 2022 and October 31, 2022, counsel for LULAC Plaintiffs emailed counsel for the State regarding the instant motion. Counsel for the State does not oppose the instant motion.

/s/ Nina Perales  
Nina Perales

**CERTIFICATE OF SERVICE**

The undersigned counsel hereby certifies that she has electronically submitted a true and correct copy of the above and foregoing via the Court's electronic filing system on the 31st day of October 2022.

/s/ Nina Perales  
Nina Perales